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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In The Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket 98-188
Table of Allotments)	
FM Broadcast Stations)	RM-9346
(Paonia & Olathe, Colorado))	

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JUN 28 1999

TO: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

SECOND EXPRESSION OF INTEREST AND SECOND REPLY COMMENTS

Good Government Radio ("GGR") filed a counterproposal in this Docket that proposed Channel 293C for allotment at Olathe, Colorado, and the substitution of Channel 270A for the proposed allotment of Channel 293A at Paonia, Colorado. GGR offered an expression of interest in this allotment. However, at the Comment period, the petitioner for Channel 293A at Paonia proposed that channel 293C1 be allotted instead of channel 293A. After this proposal on the part of the Paonia petitioner, GGR requested that its proposed substitution of Channel 270A at Paonia be dismissed.

This Reply is filed in response to the FCC's Public notice of June 11, 1999.

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Now the FCC must decide between these two competing petitioners since the two allotments are too close together to co-exist. GGR hereby expresses a continuing interest in its petition to allot channel 293C to Olathe as that community's first local service and states that its arguments for the Olathe allotments are superior to those of the Paonia petitioner for the following reasons:

ARGUMENT

1. Paonia has existing local service from KVNFM(FM) whereas Olathe has no local service.
2. Olathe has a pending application for a new NCEFM station and the proposed allotment of Channel 270C2. However, neither of these are existing service and therefore cannot be considered in the MM Docket 98-188 proceeding.
3. The allotment of Channel 293C1 at Paonia is a class C1 and would provide a new local service to 84,536 persons while the allotment of channel 293 at Olathe is a class C and would provide a new local service to 185,349 persons. Therefore, Channel 293C at Olathe serves 100, 813 more persons with a new primary signal than does channel 293C1 at Paonia.
4. The allotment of channel 293C at Olathe provides a service to an area that has less than four primary services.

Therefore, the allotment of channel 293C at Olathe is preferable to the allotment of channel 293C1 at Paonia.

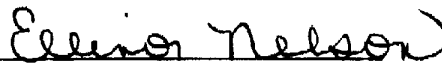
CONCLUSION

GGR petitioned the FCC to allot channel 293C to Olathe instead of channel 293C1 at Paonia. GGR continues to be interested in its requested allotment and feels it has demonstrated that according to FCC preference procedure, its request is superior to that of channel 293C1 at Paonia.

CERTIFICATION (for documents filed without an attorney)

I, Ellinor Nelson, a partner and the founding member of Good Government Radio, who is the petitioner for allotment of the channel proposed in this Notice from the Commission, do hereby verify that the statements contained in document are true and correct to the best of my knowledge and belief. It is not filed for the purpose of delaying determination on any other application or petition.

Respectfully Submitted,
GOOD GOVERNMENT RADIO


By: Ellinor Nelson, Partner

This 26th Day of June, 1999

Ellinor Nelson
Good Government Radio
P.O. Box 478
Gonzalez, FL 32560

CERTIFICATE OF SERVICE

I, Ellinor Nelson, a partner and the founding member of Good Government Radio, do hereby certify that I have on this 26th date of June, 1999, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Second Expression of Interest and Second Reply Comments**" to the following:

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Ellinor Nelson

By: Ellinor Nelson, Partner